REMARKS

Applicant appreciates the examiner's review of the present application and requests reconsideration in view of the preceding amendment and the following remarks. Claims 1-13 are pending in the present application.

The examiner has rejected claims 1, 6, 7 and 13 stating that the "search engine" mentions a symbol table and neuron table in the claim although figure 1 clearly shows these tables contained within the "teaching engine". Applicant requests reconsideration. Figure 1 is meant to visually describe what tables are associated with what engine. This is not a limitation of the present invention however. For example, as is disclosed in paragraph 0028 through paragraph 0031, the searching engine logic 16 has tables which are related to the search engine. This does not mean that the search engine cannot use other tables. A search engine, by its very name and nature, performs the function of searching some location for some information. The presentation in figure 1 does not preclude the search engine from searching a symbol table or a neuron table logically associated with another portion of the invention. These are simply other tables that are associated with other parts of the present invention. Accordingly, this rejection

should be withdrawn.

The examiner next rejects claims 1, 6, 7, 12 and 13 under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. The examiner states that the claims contain subject matter which was not described in the specification in such a way as to enable one skilled in the art to make and/or use the invention. More specifically, the examiner states that claims 12 and 13 use the term "new answer information" which is not defined in the specification while claims 1, 6, 7, 12 and 13 use the term "one character grouping" which is not defined in the specification. Applicants traverse this rejection for the reason set forth below.

With regard to the term "new answer information" the examiner is directed to at least paragraphs 0033 through paragraph 0034 and to element 100, figures 2 and 3 which show how "new" answer information 100 is added to existing answer information table 20. Accordingly, this answer information being supplied is "new" answer information being "added" to the system. This is clearly described in the specification and this rejection should be withdrawn.

With regard to the term "one character grouping" applicant also traverses this rejection. The term "character grouping" means a string of characters grouped together. Typically, a character grouping is a word but this is not necessarily so. For example, as shown in figure 2, any answer 20 includes a summary which is defined as a variable character of up to 255 places. Ultimately, this same character grouping or at least a portion thereof allowing it to be searchable, is inserted in the symbol table 22, figure 2. This is also described in the specification beginning on page 13, paragraph 0050 through page 15, paragraph 0054. Having reference to table 1 and table 2 found on page 14 illustrates that the "symbol" in both the symbol table and the answer table includes at least one "character grouping" which in the illustration, are words. Accordingly, applicant urges that the specification clearly supports and enables this recitation in the claims and therefore, the rejection should be withdrawn.

The claims stand rejected under 35 USC 103 under Miller et al. in view of Inoue et al. Miller shows a "system for product identification." Inoue teaches a "Neural network system adapted for non-linear processing." The disparate nature of the

references alone is astounding. Each invention teaches different functionality, that operate for completely different purposes, that interface with the operator in different manners, and that are coded in different software systems. Neither reference teaches a method of dynamically relating unstructured requests for information as claimed by the applicant, much less can it be said that there are actual statements in the references rising to the level of a motivation to combine the references to obtain the claims of the invention.

The Federal Circuit has repeatedly warned against using the applicant's disclosure as a blueprint to reconstruct the claimed invention out of isolated teachings in the prior art. *See, e.g., Grain Processing Corp. v. American Maize-Products*, 840 F2d. 902, 907, 5 USPQ2d 1788, 1792 (Fed. Cir. 1988). The black letter law statements by Judge Linn in *In re Kotzab*, 217 F.3d 1365, 55 USPQ2d 1313 (Fed. Cir. 2000) address this subject regarding hindsight. A critical step in analyzing the patentability of claims pursuant to section 103(a) is casting the mind back to the time of invention, to consider the thinking of one of ordinary skill in the art, guided only by the prior art references and the then-accepted wisdom in the field. Close adherence to this methodology is

especially important in cases where the very ease with which the invention can be understood may prompt one "to fall victim to the insidious effect taught is used against the teacher." (*Id.* At 1369, 55 USPQ2d at 1316).

The Examination cites to Miller as disclosing receiving feedback information. See ¶0048, ¶0211, ¶0221. However, this feedback does not at all relate to characteristics of the search. The feedback collected is used to identify other products/coupons that would be of interest to the user. The feedback does not relate to the search. The notion of this feedback being used to refine the search seems to be one made expressly in hindsight for the sole purpose of combining the references. The disparate nature of the references and lack of motivation fail to provide a prima face case of obviousness. Accordingly, the rejections to the claims should be withdrawn.

The examiner is invited to telephone the undersigned, applicant's attorney of record, to facilitate advancement of the present application.

Respectfully submitted,

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